

In The United States District Court
 Ronald C. Anderson of Delaware
 vs. 05-877
 General Motors Corp.

FILED
 CLERK U.S. DISTRICT COURT
 DISTRICT OF DELAWARE
 2008 FEB 26 PM 4:32

Motion for Reagreement

count 1). THE STATES STATES under R. 30.3 (who make attend
 deposition, copy of Reel's Attach.

4.) unless otherwise ordered by court, or Agreed
 By all parties, A deposition may be attended only by
 B. Counsel for any PARTY and members and
 Employee of their FIRM

C). A party who is A NATURAL person;
 see their letter Date Oct 17, 0, were it was Agreed
 for MR. Tyndall. Attach. under R. 30.3.

There was A motion for Judgment In matter of Law
 Filed in June 28, 07 and there was NO Respond; From
 G. M - In Violation R. 7.1.2 - under pleading & motions.
 with G. M; Had 10 days to Respond. But in there
 motion for Summary Judgment, G. M mention about
 Res Judicata - for PART of the claim. for untimely.
 This would be Prejudice Against Claim file in June 28
 07. Reason G. M file there Reponse untimely.

5888 Fundamental And Substantial Justice
Equal Employment Opportunity Commission V. U.S.
Steel Corp. 921 F.2d 489, 492 (3d cir. 1990) (quoting
Hart Steel Co. v. Railroad Supply Co. 244 U.S. 294
37 S. Ct 506 161 L Ed 1148 (1917), Res - Judicial,
Avoid the Expense And Variation Attending multiple
suits, (also it was Agreed By Both Party for Mr.
Fyndall to give Deposition). R. 30.3

THANK YOU
Roland E. Anderson
11340p 5th,
W.D., D.C., 19809

Date 2-22-08

Conf. of Service
Margaret F. England
300 D.C., Avenue
W.D., D.C., 19801
The United District of D.C. Avenue

Your Honor This show prejudice toward me for
 G.M. not allowing MR. Tyndall do this deposition as agreed, to
 R. 30.3(A) - G.M. make a statement about me, ^{not}
 After the deposition, that will file a motion to have
 my complain dismissed with prejudice and approp-
 priate cost and relief from the court.

The Rule is clear 30.3 (who make attend
 The deposition, R. 30.3 says Agreed By Both party
 As require and it was (agreed) 505 G.M. Oct 17, 07
 Letter Attack. (I would ^{like}) to file to dismiss there
 motions as well. With prejudice, In which
 is only, right - since G.M. would had done
 This Against me, for not giving my deposition
 as stated, (G.M.). Your Honor it was Agreed By Both
 parties). (most point, not (Disrespect) this court your
 Honor, Just making A Fact. with evidence as
 require, And shown. 505 Letter Attack. it was Agreed.

EYA

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(816) 292-2000. FAX (816) 292-2001

October 17, 2007

VIA FEDEX

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

As you are aware, your deposition is set for October 24, 2007 at our local counsel's office in Wilmington. I properly noticed up this deposition several weeks ago and it will begin at 9:00 a.m. As GM will be incurring the travel and deposition costs for me to attend this deposition, I want to make sure that you understand the importance of your attendance. If you fail to appear for this deposition, we will seek appropriate cost and relief from the Court, including requesting that your case be dismissed with prejudice.

Finally, while you have not noticed up any depositions, I wanted to make you aware that Mr. Tyndall is on medical leave and is unavailable for any deposition on October 24, 2007. Thank you. ✓

Very truly yours,

LATHROP & GAGE L.C.

By: 

Michael A. Williams ✓

:raf

CC 1946867v1

(5)
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Roland C. Anderson
September 10, 2007
Page 2

Very truly yours,

LATHROP & GAGE L.C.

By: 

Michael A. Williams

:raf

and

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